

Mr. Dennis Hamilton
Lear Corporation, Shenandoah Division
500 North Fillmore Road
Greencastle, IN 46135

Re: 133-11265
First Significant Permit Modification to
Part 70 133-5083-00018

Dear Mr. Hamilton:

Lear Corp., Shenandoah Division was issued a permit on May 26, 1998 for manufacturing of injection molded plastic parts for use in automobile interiors. A letter requesting to update conditions in the permit was received on August 23, 1999. Pursuant to the provisions of 326 IAC 2-7-12(d)(1) a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Comment # 1: Lear is requesting that the department amend the particulate matter roof monitoring requirements for all glue application emission units so that inspection of the particulate filters is required weekly(D.2.7(a)&(b)). Based on department's approval of the particulate monitoring amendment request, the requirement to inspect the roof is redundant. Therefore, Lear requests that this requirement be deleted.

Response # 1: Complying with the requirements of 326 IAC 6-3 can be especially variable for glue booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the glue booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. So conditions D.2.7(a), D.2.7(b) and D.2.8 (b) shall amended as follows(changes in bold):

The Permittee is removing the Ranger paint application line, identified as Paint Line 1 which consists of two (2) paint booths 1 and 2. So conditions A.2(1), D.1(1), and D.1.2(a) shall be

deleted from the permit. Conditions D.1.1, D.1.2, D.1.3 and D.1.7 shall be amended as follows below(changes in bold).

The Permittee is requesting to rename the "S-Van" paint line, identified as Paint Line 2 which consists of two(2) paint booths 3 and 4, and exhausting to stacks 3 and 4 as Paint Line 1 which consists of two (2) paint booths 1 and 2 and exhausting to stacks 1 and 2 because the Ranger paint application line, identified as Paint Line 1 which consists of two (2) paint booths 1 and 2 is being removed. So conditions A.2(2), D.1(2), D.1.1, D.1.2(b), D.1.3 and D.1.7 of the permit shall be amended as follows below (changes in bold).

The Permittee is requesting to rename the booths identified as Glue Booths 1, 2, 6, 7, 10 and 12, exhausting to stacks 12, 10, and 14 as Bolster Wraps 10A, 10B, 11, 12, 9A and 9B, exhausting to stacks 10, 11, 12 and 9, respectively. Glue Booths 3, 4 and 5 identified in the permit do not correspond to any emission units currently at the source and will be removed from the description. So conditions A.2(3), D.2(3), D.2.1, D.2.2, D.2.3, D.2.6, D.2.7(a) and D.3 shall be amended as follows below (changes in bold).

The Permittee is requesting to rename the glue booths identified as Glue Booths 22 and 23 and the bolster wrap machines identified as Bolster Wraps 24 and 25, all exhausting to stack 20, as Glue Booths 7A and 8A and Bolster Wraps 7B and 8B, exhausting to stacks 7 and 8. So conditions A.2(5), D.3(5), D.3.1(a), D.3.2, D.3.7, and D.3.8(a) shall be amended as follows below (changes in bold).

The Permittee is requesting to remove references to Glue Booths 27, 28 and 29 which were approved for construction in the original Part 70 permit under enhanced new source review (ENSR). These booths do not exist at the plant. So condition A.2(7) shall be amended as follows below (changes in bold) and Section D.4 of the permit shall be removed entirely from the permit because it relates only to these emission units.

The Permittee is removing the touch-up paint hood near pad printing room. So condition A.3(2)(c) and D.6(2)(c) shall be deleted from the permit. The Permittee is also changing the touch-up paint booth in the "Ranger" room to a touch-up paint booth 1 in the "S-Van" paint room, changing touch-up paint booth in "S-Van" to touch-up paint booth 2 in the "S-Van" paint room and changing mask washer in the "Ranger" room to mask washer in the "S-Van" paint room. So conditions A.3(2)(a), A.3(2)(b), A.3(2)(d), D.6(2)(a), D.6(2)(b), D.6(2)(d) and D.6.1 shall be amended as follows below(changes in bold):

Due to renaming of glue booths, paint line and stacks, the compliance data section, Part 70 Quarterly report forms shall be amended as follows below(changes in bold):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (2 1) One ~~S-Van~~ paint application line, identified as Paint Line ~~2~~ **1** consisting of two (2) paint booths, ~~3~~ **1** and ~~4~~ **2**, and one (1) curing oven, with a maximum capacity of 420 plastic parts per hour, with particulate matter overspray from each booth controlled by water curtain, and exhausting to stacks ~~3~~ **1**, ~~4~~ **2**, and 5.
- (3-2) ~~Nine (9)~~ **Six (6)** glue booths ~~bolster wraps~~, identified as ~~Glue Booth~~ **Bolster Wrap** ~~1-7;~~ **10A, 10B, 11 and 12**, each with a maximum capacity of 125 plastic and fabric parts per hour, and exhausting to stacks ~~10, 12, 13, and 14~~ **9, 10, 11 and 12**.

~~Glue Booths~~ **Bolster Wraps 5, 6, and 7 11 and 12** use dry filters for particulate matter overspray control.

- (4 3) One (1) paint at press booth, identified as PPB, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.
- (5-4) Two (2) glue booths, identified as Glue Booths ~~22 and 23~~ **7A and 8A**, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks ~~20 7 and 8, respectively~~, and two (2) bolster wrap machines, identified as Bolster Wraps ~~24 and 25~~ **7B and 7B2**, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks ~~20 7 and 8, respectively~~. The combined maximum capacity of these units is 288 plastic automotive parts per hour.
- (6) ~~Three (3) glue booths, identified as Glue Booths 27-29 each with a maximum capacity of 125 plastic and fabric parts per hour, with dry filters for control of particulate matter overspray, with Glue Booth 27 exhausting to stack 13, and Glue Booths 28 and 29 exhausting to stack 23.~~

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (2) Other categories with emissions below insignificant thresholds:
 - (a) Touch-up paint booth 1 in “~~Ranger~~” paint room;
 - (b) Touch-up paint booth 2 in “~~S-Van~~” paint room;
 - (d c) Mask washer in “~~Ranger~~” paint room;

SECTION D.1 FACILITY OPERATION CONDITIONS

- (2 1) One ~~S-Van~~ paint application line, identified as Paint Line 2 1 consisting of two (2) paint booths, 3 1 and 4 2, and one (1) curing oven, with a maximum capacity of 420 plastic parts per hour, with particulate matter overspray from each booth controlled by water curtain, and exhausting to stacks 3 1, 4 2, and 5.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), ~~Paint Line 1 and Paint Line 2~~ are 1 is subject to the use of low pressure-high volume spray equipment, with a transfer efficiency of no less than fifty-five percent (55%), and no coating containing greater than 6.1 pounds of VOC per gallon of coating, excluding water.

D.1.2 PSD Minor Source Limit [326 IAC 2-2] [40 CFR 52.21]

(b a) ~~Second~~ First Limitation - Pursuant to OP 3520-0018-0132, issued on June 27, 1990, the quantity of paint and solvent delivered to the applicator shall be such that VOC emissions from Paint Line 2 1 shall not exceed 10.33 tons per month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from ~~Paint Line 1 and Paint Line 2~~ 1 shall each not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

The water curtains for PM control shall be in operation at all times when ~~Paint Line 1 or Paint Line 2~~ 1 is in operation.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (3 2) ~~Nine (9)~~ Six (6) glue booths bolster wraps, identified as ~~Glue Booth Bolster Wrap 1-7, 10 and 12~~ 9A, 9B, 10A, 10B, 11 and 12, each with a maximum capacity of 125 plastic and fabric parts per hour, and exhausting to stacks 10, 12, 13, and 14 9, 10, 11 and 12. ~~Glue Booths Bolster Wraps 5, 6, and 7~~ 11 and 12 use dry filters for particulate matter overspray control.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

- (a) Pursuant to CP 133-2380, issued on April 21, 1992, the VOC content of the glue supplied to the applicators of ~~Glue Booths~~ **Bolster Wraps 6 and 7 11 and 12** shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable to these facilities.
- (b) The VOC content of the glue supplied to the applicators of ~~Glue Booths~~ **Bolster Wraps 10 and 12 9A and 9B** shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable to these facilities.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the ~~Glue Booths~~ **Bolster Wraps (1-7, 10 and 12 9A, 9B, 10A, 10B, 11 and 12)** shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~Glue Booths~~ **Bolster Wraps 6, 7, 10 and 12 9A, 9B, 11 and 12** and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when ~~Glue Booths~~ **Bolster Wraps 5, 6, and 7 11 and 12** are in operation.

D.2.7 Monitoring

- (a) Daily inspections shall be performed at ~~Glue Booths~~ **Bolster Wraps 5, 6, and 7 11 and 12** to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (b) To document compliance with Conditions D.2.6 and D.2.7, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily, ~~and~~ weekly **and monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

SECTION D.3

FACILITY OPERATION CONDITIONS

- (~~4~~ **3**) One (1) paint at press booth, identified as PPB, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.
- (~~5-4~~) Two (2) glue booths, identified as Glue Booths ~~22 and 23~~ **7A and 8A**, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks ~~20 7 and 8, respectively~~, and two (2) bolster wrap machines, identified as Bolster Wraps ~~24 and 25~~ **7B and 8B**, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks ~~20 7 and 8, respectively~~. The combined maximum capacity of these units is 288 plastic automotive parts per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

- (a) Pursuant to CP 133-8476-00018, issued on September 11, 1997, the VOC content of the glue supplied to the applicators of Glue Booths ~~22 and 23~~ **7A and 8A** and Bolster Wraps ~~24 and 25~~ **7B and 8B** shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) not applicable to these facilities.

D.3.2 PSD Minor Source Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC content delivered to the applicator of Glue Booths ~~22, 23, 7A and 8A and 27-29~~ (~~specified in Section D.4~~), Bolster Wraps ~~24 and 25~~ **7B and 8B** and the Paint at Press Booth, shall be such that VOC emissions from these combined facilities shall not exceed 3.25 tons per month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when Glue Booths ~~22 and 23~~ **7A and 8A**, Bolster Wraps ~~24 and 25~~ **7B and 8B** and the Paint at Press Booth are in operation.

D.3.8 Monitoring

- (a) Daily inspections shall be performed at Glue Booths ~~22 and 23~~ **7A and 8A**, Bolster Wraps ~~24 and 25~~ **7B and 8B** and the Paint at Press Booth to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

***** This section has been removed *****

SECTION D.6 FACILITY CONDITIONS

Insignificant Activities:

- (2) Other categories with emissions below insignificant thresholds:
- (a) Touch-up paint booth **1** in "~~Ranger~~" paint room;
 - (b) Touch-up paint booth **2** in "~~S-Van~~" paint room;
 - (~~d~~ **c**) Mask washer in "~~Ranger~~" paint room;

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 133-2333, issued on January 28, 1992, the insignificant touch-up booth **1** and the mask washer in the "~~Ranger~~" paint room have been limited to combined VOC emissions less than 24 tons per year to retain a registered status and so that 326 IAC 8-1-6 does not apply. Any change or modification that would cause an increase in potential emissions above 25 tons per year shall require prior approval by OAM.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Lear Corporation, Shenandoah Division
Source Address: 500 North Fillmore Road, Greencastle, IN 46135
Mailing Address: 500 North Fillmore Road, Greencastle, IN 46135
Part 70 Permit No.: T133-5083-00018
Facility: ~~Paint Line 1 and Paint Line 2~~ 1
Parameter: VOC emissions
Limit: 10.33 tons per month (equivalent to 124 tons per year)-each-

YEAR: _____

VOC emission from Paint Line-2 1 this month	
Month	
Month 1	
Month 2	
Month 3	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Lear Corporation, Shenandoah Division
Source Address: 500 North Fillmore Road, Greencastle, IN 46135
Mailing Address: 500 North Fillmore Road, Greencastle, IN 46135
Part 70 Permit No.: T133-5083-00018
Facility: Glue Booths ~~6~~ **11** and ~~7~~ **12**, and Glue Booths ~~40~~ **9A** and ~~42~~ **9B**
Parameter: VOC emissions
Limit: 2.0 tons per month (equivalent to 24 tons per year) **for Booths 11 and 12**
2.0 tons per month (equivalent to 24 tons per year) **for Booths 9A and 9B**

YEAR: _____

Month	Combined VOC emission from Glue Booths 6 11 and 7 12 this month	Combined VOC emission from Glue Booths 40 9A and 42 9B this month
Month 1		
Month 2		
Month 3		

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Lear Corporation, Shenandoah Division
Source Address: 500 North Fillmore Road, Greencastle, IN 46135
Mailing Address: 500 North Fillmore Road, Greencastle, IN 46135
Part 70 Permit No.: T133-5083-00018
Facility: Glue Booths ~~22 7A, 23 and 8A, and 27-29~~; Bolster Wraps ~~24 7B and 25 8B~~;
Paint at Press Booth
Parameter: VOC emissions
Limit: 2.0 tons per month (equivalent to 24 tons per year) combined for Glue Booths ~~22 7A and 23 8A, and Bolster Wraps 24 7B and 25 8B~~; 2.0 tons per month (equivalent to 24 tons per year) for Paint at Press Booth; and total for Glue Booths ~~22 7A, 23 and 8A, 27-29~~, Bolster Wraps ~~24 7B and 25 8B~~, and Paint at Press Booth of 3.25 tons per month (equivalent to 39 tons per year).

YEAR: _____

Month	VOC emissions from Paint at Press Booth this month	VOC emissions from Glue Booths 27-29 7A and 8A, and Bolster Wraps 7B and 8B this month	Combined VOC emission from Glue Booths 22 7A, 23 and 8A, 27-29 , Bolster Wraps 24 7B and 25 8B and Paint at Press Booth this month
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janusz Johnson, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension 2-8325, or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments: Revised Title V Permit
Spahi/jkj

cc: File - Putnam County
U.S. EPA, Region V
Putnam County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Lear Corporation, Shenandoah Division
500 North Fillmore Road
Greencastle, IN 46135**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T133-5083-00018	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: May 26, 1998

First Significant Permit Modification: 133-11265	Pages Affected: cover, 2-7, 29-42, and 46-48
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Stratospheric Ozone Protection

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- D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]
- D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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- D.1.5 Testing Requirements [326 IAC 2-7-6(1)]
- D.1.6 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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- D.2.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]
- D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.4 Testing Requirements [326 IAC 2-7-6(1)]
- D.2.5 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.6 Particulate Matter (PM)

D.2.7 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

D.2.9 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Paint at Press Booth, Glue Booths 7A and 8A, Bolster Wraps 7B and 8B, Glue Booths 17 and 19, and Bolster Wraps 18, 20, 21 and 22

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Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.3.5 Testing Requirements [326 IAC 2-7-6(1)]

D.3.6 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Particulate Matter (PM)

D.3.8 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

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Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.3 Compliance Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.4 Record Keeping and Reporting Requirements

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Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

D.6.2 Particulate Matter [326 IAC 6-3]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Compliance Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Record Keeping and Reporting Requirements

Certification Form

Emergency/Deviation Occurrence Report

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Compliance Report Form

SECTION A**SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary plant for the manufacture of injection molded plastic parts for use in automobile interiors.

Responsible Official: Dennis Hamilton, General Manager
 Source Address: 500 North Fillmore Road. Greencastle, Indiana 46135
 Mailing Address: 500 North Fillmore Road. Greencastle, Indiana 46135
 SIC Code: 3089
 County Location: Putnam
 County Status: Attainment for all criteria pollutants
 Source Status: Part 70 Permit Program
 Major Source, under PSD Rules;
 Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One paint application line, identified as Paint Line 1 consisting of two (2) paint booths, 1 and 2, and one (1) curing oven, with a maximum capacity of 420 plastic parts per hour, with particulate matter overspray from each booth controlled by water curtain, and exhausting to stacks 1, 2, and 5.
- (2) Six (6) bolster wraps, identified as Bolster Wrap 9A, 9B, 10A, 10B, 11 and 12, each with a maximum capacity of 125 plastic and fabric parts per hour, and exhausting to stacks 9, 10, 11 and 12. Bolster Wraps 11 and 12 use dry filters for particulate matter overspray control.
- (3) One (1) paint at press booth, identified as PAP1, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.
- (4) Two (2) glue booths, identified as Glue Booths 7A and 8A, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively, and two (2) bolster wrap machines, identified as Bolster Wraps 7B and 8B, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively. The combined maximum capacity of these units is 288 plastic automotive parts per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (water boiler - 0.78 MMBtu/hr, water boiler - 1.092 MMBtu/hr, comfort heat boiler - 0.745 MMBtu/hr, space heaters).
- (2) Other categories with emissions below insignificant thresholds:
 - (a) Touch-up paint booth 1 in paint room;

(b) Touch-up paint booth 2 in paint room;

(c) Mask washer in paint room;

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION D.1**FACILITY OPERATION CONDITIONS**

- (1) One paint application line, identified as Paint Line 1 consisting of two (2) paint booths, 1 and 2, and one (1) curing oven, with a maximum capacity of 420 plastic parts per hour, with particulate matter overspray from each booth controlled by water curtain, and exhausting to stacks 1, 2, and 5.

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 (BACT), Paint Line 1 is subject to the use of low pressure-high volume spray equipment, with a transfer efficiency of no less than fifty-five percent (55%), and no coating containing greater than 6.1 pounds of VOC per gallon of coating, excluding water.

D.1.2 PSD Minor Source Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) First Limitation - Pursuant to OP 3520-0018-0132, issued on June 27, 1990, the quantity of paint and solvent delivered to the applicator shall be such that VOC emissions from Paint Line 1 shall not exceed 10.33 tons per month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Paint Line 1 shall each not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements**D.1.5 Testing Requirements [326 IAC 2-7-6(1)]**

If testing is required, compliance with the VOC limits specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-5 and 326 IAC 2-7-6.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**D.1.7 Particulate Matter (PM)**

The water curtains for PM control shall be in operation at all times when Paint Line 1 is in operation.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify that the water flow rate is sufficient to produce a uniform water curtain.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plans.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**D.1.9 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of daily water curtain inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2**FACILITY OPERATION CONDITIONS**

- (2) Six (6) bolster wraps, identified as Bolster Wrap 9A, 9B, 10A, 10B, 11 and 12, each with a maximum capacity of 125 plastic and fabric parts per hour, and exhausting to stacks 9, 10, 11 and 12. Bolster Wraps 11 and 12 use dry filters for particulate matter overspray control.

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.2.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]**

- (a) Pursuant to CP 133-2380, issued on April 21, 1992, the VOC content of the glue supplied to the applicators of Bolster Wraps 11 and 12 shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable to these facilities.
- (b) The VOC content of the glue supplied to the applicators of Bolster Wraps 9A and 9B shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable to these facilities.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the Bolster Wraps (9A, 9B, 10A, 10B, 11 and 12) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Bolster Wraps 9A, 9B, 11 and 12, and any control devices.

Compliance Determination Requirements**D.2.4 Testing Requirements [326 IAC 2-7-6(1)]**

If testing is required, compliance with the VOC limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**D.2.6 Particulate Matter (PM)**

The dry filters for PM control shall be in operation at all times when Bolster Wraps 11 and 12 are in operation.

D.2.7 Monitoring

- (a) Daily inspections shall be performed at Bolster Wraps 11 and 12 to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters,

weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plans.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.6 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily, weekly and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3**FACILITY OPERATION CONDITIONS**

- (3) One (1) paint at press booth, identified as PAP1, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.
- (4) Two (2) glue booths, identified as Glue Booths 7A and 8A, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively, and two (2) bolster wrap machines, identified as Bolster Wraps 7B and 8B, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively. The combined maximum capacity of these units is 288 plastic automotive parts per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.3.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]**

- (a) Pursuant to CP 133-8476-00018, issued on September 11, 1997, the VOC content of the glue supplied to the applicators of Glue Booths 7A and 8A and Bolster Wraps 7B and 8B shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) not applicable to these facilities.
- (b) Pursuant to CP 133-8476-00018, issued on September 11, 1997, the VOC content delivered to the applicators of the paint at press booth (PAP1) shall not exceed 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) not applicable to these facilities.

D.3.2 PSD Minor Source Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC content delivered to the applicator of Glue Booths 7A and 8A, Bolster Wraps 7B and 8B and the paint at press booth (PAP1), shall be such that VOC emissions from these combined facilities shall not exceed 3.25 tons per month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the paint at press booth (PAP1) and all the glue booths and bolster wraps booths (in the section D.3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements**D.3.5 Testing Requirements [326 IAC 2-7-6(1)]**

If testing is required, compliance with the VOC limits specified in Condition D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**D.3.7 Particulate Matter (PM)**

The dry filters for PM control shall be in place at all times when Glue Booths 7A and 8A, Bolster Wraps 7B and 8B and the paint at press booth (PAP1) are in operation.

D.3.8 Monitoring

- (a) Daily inspections shall be performed at Glue Booths 7A and 8A, Bolster Wraps 7B and 8B and the paint at press booth (PAP1) to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plans.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**D.3.9 Record Keeping Requirements**

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1 and D.3.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.3.7 and D.3.8, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4

FACILITY OPERATION CONDITIONS

***** This section (D.4) has been removed from the permit *****

***** This section (D.4) has been removed from the permit *****

***** This section (D.4) has been removed from the permit *****

SECTION D.5**FACILITY OPERATION CONDITIONS****Insignificant Activities:**

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (water boiler - 0.78 MMBtu/hr, water boiler - 1.092 MMBtu/hr, comfort heat boiler - 0.745 MMBtu/hr, space heaters).

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.5.1 Particulate Matter (PM) [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 0.78 MMBtu per hour boiler, the 1.092 MMBtu per hour boiler and the 0.745 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.

Compliance Determination Requirement**D.5.2 Testing Requirements [326 IAC 2-7-6(1)]**

If testing is required, compliance with the PM limits specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**D.5.3 Compliance Monitoring**

There are no compliance monitoring requirements for these insignificant activities.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**D.5.4 Record Keeping and Reporting Requirements**

There are no record keeping and reporting requirements for these insignificant activities.

SECTION D.6**FACILITY CONDITIONS**

Insignificant Activities:

(2) Other categories with emissions below insignificant thresholds:

- (a) Touch-up paint booth 1 in paint room;
- (b) Touch-up paint booth 2 in paint room;
- (c) Mask washer in paint room;

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

Pursuant to CP 133-2333, issued on January 28, 1992, the insignificant touch-up booth 1 and the mask washer in the paint room have been limited to combined VOC emissions less than 24 tons per year to retain a registered status and so that 326 IAC 8-1-6 does not apply. Any change or modification that would cause an increase in potential emissions above 25 tons per year shall require prior approval by OAM.

D.6.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the insignificant painting operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**D.6.3 Compliance Monitoring**

There are no compliance monitoring requirements for these insignificant activities.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**D.6.4 Record Keeping and Reporting Requirements**

There are no record keeping or reporting requirements for these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Lear Corporation, Shenandoah Division
Source Address: 500 North Fillmore Road, Greencastle, IN 46135
Mailing Address: 500 North Fillmore Road, Greencastle, IN 46135
Part 70 Permit No.: T133-5083-00018
Facility: Paint Line 1
Parameter: VOC emissions
Limit: 10.33 tons per month (equivalent to 124 tons per year)

YEAR: _____

Month	VOC emission from Paint Line 1 this month
Month 1	
Month 2	
Month 3	

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Lear Corporation, Shenandoah Division
Source Address: 500 North Fillmore Road, Greencastle, IN 46135
Mailing Address: 500 North Fillmore Road, Greencastle, IN 46135
Part 70 Permit No.: T133-5083-00018
Facility: Glue Booths 11 and 12, and Glue Booths 9A and 9B
Parameter: VOC emissions
Limit: 2.0 tons per month (equivalent to 24 tons per year) for Booths 11 and 12
2.0 tons per month (equivalent to 24 tons per year) for Booths 9A and 9B

YEAR: _____

Month	Combined VOC emission from Glue Booths 11 and 12 this month	Combined VOC emission from Glue Booths 9A and 9B this month
Month 1		
Month 2		
Month 3		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Lear Corporation, Shenandoah Division
Source Address: 500 North Fillmore Road, Greencastle, IN 46135
Mailing Address: 500 North Fillmore Road, Greencastle, IN 46135
Part 70 Permit No.: T133-5083-00018
Facility: Glue Booths 7A and 8A; Bolster Wraps 7B and 8B; Paint at press booth (PAP1)
Parameter: VOC emissions
Limit: 2.0 tons per month (equivalent to 24 tons per year) combined for Glue Booths 7A and 8A, and Bolster Wraps 7B and 8B; 2.0 tons per month (equivalent to 24 tons per year) for Paint at press booth (PAP1); and total for Glue Booths 7A and 8A, Bolster Wraps 7B and 8B, and Paint at press booth (PAP1) of 3.25 tons per month (equivalent to 39 tons per year).

YEAR: _____

Month	VOC emissions from Paint at press booth (PAP1) this month	VOC emissions from Glue Booths 7A and 8A, and Bolster Wraps 7B and 8B this month	Combined VOC emission from Glue Booths 7A and 8A, Bolster Wraps 7B and 8B and Paint at press booth (PAP1) this month
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Lear Corporation, Shenandoah Division
Source Location:	500 North Fillmore Road, Greencastle, Indiana 46135
County:	Putnam
SIC Code:	3089
Operation Permit No.:	T 133-5083-00018
Operation Permit Issuance Date:	May 26, 1998
Permit Modification No.:	133-11265-00018
Permit Reviewer:	Spahi/Janusz Johnson

On December 22, 1999, the Office of Air Management (OAM) had a notice published in the *Banner Graphics*, Greencastle, Indiana, stating that Lear Corporation had applied for a Significant Permit Modification. The notice also stated that OAM proposed to issue a permit for this permit modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 10, 2000, Lear Corporation, Shenandoah Division submitted comments on the proposed permit modification. The summary of the comments and corresponding responses is as follows (new permit language is bolded for emphasis):

Comment 1: All references to S-Van should be removed and replaced by Ranger. This will include Sections A.2(1), A.3(2)(a-c), D.1(1), D.6(2)(a-c), and D.6.1. The Ranger Paint Line was shut down but the paint application of the paint line remaining will continue to be for the Ranger. Paint application for the S-Van was discontinued.

Response 1: The paint line has been re-named Paint Line 1 and further reference to the model type (S-Van or Ranger) of parts coated in the paint line is not necessary for equipment identification purposes and irrelevant for permitting purposes. Therefore, the S-Van language shall be removed from the equipment description, but will not be replaced by the Ranger language to avoid similar issues in the future. The references to S-Van have been removed from the proposed A.2(1), A.3(2), D.1(1), D.6(2), and D.6.1 (proposed permit Pages 6, 7, 29, and 42, respectively) as follows:

A.2 (1) One ~~S-Van~~ paint application line, identified as Paint Line 1 consisting of two (2) paint booths, 1 and 2, and one (1) curing oven, with a maximum capacity of 420 plastic parts per hour, with particulate matter overspray from each booth controlled by water curtain, and exhausting to stacks 1, 2, and 5.

A.3 (2) Other categories with emissions below insignificant thresholds:

- (a) Touch-up paint booth 1 in "~~S-Van~~" paint room;
- (b) Touch-up paint booth 2 in "~~S-Van~~" paint room;
- (c) Mask washer in "~~S-Van~~" paint room;

D.1 (1) One ~~S-Van~~ paint application line, identified as Paint Line 1 consisting of two (2) paint booths, 1 and 2, and one (1) curing oven, with a maximum capacity of 420

plastic parts per hour, with particulate matter overspray from each booth controlled by water curtain, and exhausting to stacks 1, 2, and 5.

D.6 (2) Other categories with emissions below insignificant thresholds:

- (a) Touch-up paint booth 1 in "~~S-Van~~" paint room;
- (b) Touch-up paint booth 2 in "~~S-Van~~" paint room;
- (c) Mask washer in "~~S-Van~~" paint room;

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 133-2333, issued on January 28, 1992, the insignificant touch-up booth 1 and the mask washer in the "~~S-Van~~" paint room have been limited to combined VOC emissions less than 24 tons per year to retain a registered status and so that 326 IAC 8-1-6 does not apply. Any change or modification that would cause an increase in potential emissions above 25 tons per year shall require prior approval by OAM.

Note: The revisions to the conditions outlined in the Significant Permit Modification cover letter have also been revised to be consistent with the changes outlined above.

Comment 2: Paragraph 3, pg 2 of 11, the permittee requested to rename glue booths 1, 2, 6, 7, 10 and 12 as Bolster Wraps 10A, 10B, 11, 12, 9A and 9B.

Response 2: Glue Booths 1, 2, 6, 7, 10 and 12 were renamed in the proposed modification as Glue Booths 10A, 10B, 11, 12, 9A and 9B. The language in A.2(2), D.2(2), D.2.1, D.2.2, D.2.3, D.2.6, and D.2.7(a) (Pages 6, 32, 33 and 35 of the proposed permit pages) shall be further revised to clarify that they are "Bolster Wraps" rather than "Glue Booths" as follows:

A.2 (2) Six (6) ~~glue booths~~ **bolster wraps**, identified as ~~Glue Booth~~ **Bolster Wrap** 9A, 9B, 10A, 10B, 11 and 12, each with a maximum capacity of 125 plastic and fabric parts per hour, and exhausting to stacks 9, 10, 11 and 12. ~~Glue Booths Bolster Wraps~~ 11 and 12 use dry filters for particulate matter overspray control.

D.2 (2) Six (6) ~~glue booths~~ **bolster wraps**, identified as ~~Glue Booth~~ **Bolster Wrap** 9A, 9B, 10A, 10B, 11 and 12, each with a maximum capacity of 125 plastic and fabric parts per hour, and exhausting to stacks 9, 10, 11 and 12. ~~Glue Booths Bolster Wraps~~ 11 and 12 use dry filters for particulate matter overspray control.

D.2.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

- (a) Pursuant to CP 133-2380, issued on April 21, 1992, the VOC content of the glue supplied to the applicators of ~~Glue Booths Bolster Wraps~~ 11 and 12 shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable to these facilities.

- (b) The VOC content of the glue supplied to the applicators of ~~Glue Booths~~ **Bolster Wraps** 9A and 9B shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable to these facilities.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the ~~Glue Booths~~ **Bolster Wraps** (9A, 9B, 10A, 10B, 11 and 12) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~Glue Booths~~ **Bolster Wraps** 9A, 9B, 11 and 12, and any control devices.

D.2.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when ~~Glue Booths~~ **Bolster Wraps** 11 and 12 are in operation.

D.2.7 Monitoring

- (a) Daily inspections shall be performed at ~~Glue Booths~~ **Bolster Wraps** 11 and 12 to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Note: The revisions to the conditions outlined in the Significant Permit Modification cover letter have also been revised to be consistent with the changes outlined above.

Comment 3: There is a typo in the renaming of Bolster Wrap 25 as 7B2. This should have been 8B. This error is carried to Sections A.2(4), D.3(4), D.3.2, D.3.7 and D.3.8.

Response 3: This typographical error was made in the proposed operating conditions A.2(4), D.3(4), D.3.1(a) and D.3.2 (Pages 6 and 35). The emission unit was correctly identified in proposed conditions D.3.7 and D.3.8. The revised conditions are as follows:

A.2 (4) Two (2) glue booths, identified as Glue Booths 7A and 8A, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively, and two (2) bolster wrap machines, identified as Bolster Wraps 7B and ~~7B2~~ **8B**, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively. The combined maximum capacity of these units is 288 plastic automotive parts per hour.

D.3 (4) Two (2) glue booths, identified as Glue Booths 7A and 8A, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively, and two (2) bolster wrap machines, identified as Bolster Wraps 7B and ~~7B2~~ **8B**, equipped with air atomization spray applicators, with dry filters for overspray control, and exhausting to stacks 7 and 8, respectively. The combined maximum capacity of these units is 288 plastic automotive parts per hour.

D.3.1 (a) Pursuant to CP 133-8476-00018, issued on September 11, 1997, the VOC content of the glue supplied to the applicators of Glue Booths 7A and 8A and Bolster Wraps 7B and ~~7B2~~ **8B** shall not exceed a combined total of 2.0 tons per month. Compliance with this limit will make 326 IAC 8-1-6 (BACT) not applicable to these facilities.

D.3.2 PSD Minor Source Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC content delivered to the applicator of Glue Booths 7A and 8A, Bolster Wraps 7B and ~~7B2~~ **8B** and the Paint at Press Booth, shall be such that VOC emissions from these combined facilities shall not exceed 3.25 tons per month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Note: The revisions to the conditions outlined in the Significant Permit Modification cover letter have also been changed to be consistent with the renaming Bolster Wrap 25 to Bolster Wrap 8A.. In addition to the changes above, the revision language of conditions D.3.7 and D.3.8 in the cover letter contained the error and has been corrected.

Comment 4: The renaming of PAP to PAP₁ was not done.

Response 4: The paint at press booth is identified in the Part 70 permit as PPB. This emission unit shall be renamed PAP₁ as requested. The following descriptive language in Section A.2 (Page 6 of the permit) and Section D.3 (Page 35 of the permit) shall be revised as follows:

A.2 (3) One (1) paint at press booth, identified as PPB **PAP₁**, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.

D.3 (3) One (1) paint at press booth, identified as PPB **PAP₁**, equipped with high-volume low-pressure (HVLP) spray applicators with a maximum capacity of 130 plastic automotive parts per hour, with dry filters for overspray control, exhausting to stacks 21 and 22.

The references to the renamed PAP₁ emission unit in the operating conditions of Section D.3 (conditions D.3.1, D.3.2, D.3.3, D.3.7 and D.3.8) and the quarterly reporting forms shall be changed from "paint at press booth" to "paint at press booth (PAP₁)" to be consistent with the descriptive changes outlined above.

Note: These revisions to the descriptive information and conditions are not outlined in the Significant Permit Modification cover letter. These changes are considered administrative in nature and do not constitute a significant revision to the permit modification.

Comment 5: There are no references for Paint at Press Booths PAP₂, PAP₃, and PAP₄ in A.2.

Response 5: The paint at press booths PAP2, PAP3 and PAP4 were originally permitted under enhanced new source review (ENSR) in Construction Permit 133-9756-00018 issued on December 9, 1998. Based on the provisions of 326 IAC 2-1-3.2 (State construction and operating permits: enhanced new source review), a permit issued under the section shall be incorporated into the source's Part 70 permit through an administrative amendment in accordance with 326 IAC 2-7-11. Review of the permitting records for Lear Corporation indicates that an amendment to incorporate CP133-9756-00018 into the Part 70 permit (T133-5083-00018) was not issued. Because the Part 70 permit was never revised to include the PAP2, PAP3 and PAP4 emission units, subsequently revised Part 70 permit pages have not contained references to these units. To maintain as clear a permit revision history as possible, an additional and separate administrative amendment (133-11897) shall be issued to correct the situation.

Comment 6: Under Article [326 IAC] 2-7-11(a)(7) and administrative amendment "makes a change to a monitoring maintenance, or record keeping requirement established by this article that is not environmentally significant. Such change shall not be an administrative amendment if the monitoring, maintenance or record keeping is required by an applicable requirement."

This modification is being processed as a significant permit modification (page 2 of 2) due to the relaxation of the monitoring requirement where there is no underlying applicable requirement. Why is the modification processed as a significant permit revision?

Response 6: This permit modification is processed as a Significant Permit Modification because pursuant to 326 IAC 2-7-12 (d)(1), "Significant modification procedures shall be used for applications requesting Part 70 permit modification that do not qualify as minor permit modifications or as administrative amendments. Every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant." The OAM considers the relaxation of monitoring requirements in this case to be a significant change. This determination does not preclude the review of changes to monitoring requirements which are not considered significant as administrative amendments under 326 IAC 2-7-11.

On January 26, 2000, the IDEM, OAM, determined that an administrative correction to the proposed Significant Permit Modification was required to clarify the applicability of 326 IAC 6-3 to the Paint at Press Booth 1 in Section D.3, Condition D.3.3. The following amended language corrects a typographical error in the original Part 70 permit which was not included in previous permit revisions:

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from ~~Paint Line 2~~, **the paint at press booth** and all the glue booths and bolster wraps booths (in the section D.3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Lear Corporation, Shenandoah Division
Source Location:	500 North Fillmore Road, Greencastle, Indiana 46135
County:	Putnam
SIC Code:	3089
Operation Permit No.:	T 133-5083-00018
Operation Permit Issuance Date:	May 26, 1998
Permit Modification No.:	133-11265-00018
Permit Reviewer:	Spahi/Janusz Johnson

The Office of Air Management (OAM) has reviewed a modification application from Lear Corporation, Shenandoah Division relating to the operation of injection molded plastic parts for use in automobile interiors.

History

On August 23, 1999, Lear Corporation, Shenandoah Division submitted an application to the OAM requesting to relax a couple of monitoring conditions for their glue booths and update the equipment description at their existing plant. Lear Corporation, Shenandoah Division was issued a Part 70 permit on May 26, 1998.

Enforcement Issue

There are no enforcement actions pending.

Existing Approvals

The source was issued a Part 70 Operating Permit T 133-5083-00018 on May 26, 1998. The source has since received the following:

- (a) First Minor Source Modification 133-11168, issued on August 10, 1999;
- (b) CP 133-9756, issued on December 9, 1998,
- (c) CP 133-8476, issued on September 11, 1997,
- (d) First Administrative Amendment 133-6385, issued on August 27, 1996.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 23, 1999.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) because the monitoring conditions (conditions D.2.7(a) & (b)) for the glue booths 9A, 9B and 10A are being relaxed (visible emissions from daily to weekly and roof top monitoring from weekly to monthly) and this relaxation of the monitoring conditions is a significant change in the existing monitoring Part 70 permit terms or conditions.

County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR art 63) applicable to this source.

Conclusion

The operation of this injection molding plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. 133-11265-00018.